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Attorneys for Defendants,
HERITAGE TECHNOLOGIES, INC., CARL THOMPSON
and CHARLES WISSMAN

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION

GREENLEE TEXTRON INC., a Delaware

corporation,

Plaintiff,

v.

HERITAGE TECHNOLOGIES, INC., a California
Corporation; CARL THOMPSON, an individual;
CHARLES WISSMAN, an individual; and DOES 1-
10,

Defendants.

Case No.: 07 CV 2038 WQH (RBB)

**JOINT MOTION TO EXTEND TIME
FOR DEFENDANTS TO RESPOND
TO COMPLAINT**

IT IS HEREBY STIPULATED by and between the parties to the above-entitled action, through their respective counsel, subject to the approval of this Honorable Court, that Defendants' time to answer or otherwise respond to the Complaint be extended up to and including December 19, 2007.

This stipulation is made pursuant to CivLR 7.2 and 12.1 and is not entered into for the purposes of inconvenience or delay. Defendant HERITAGE TECHNOLOGIES, INC. has agreed to provide to Plaintiff an exemplar of the accused device and schematic drawings

1 subject to a confidentiality agreement, and Plaintiff will conduct testing on the device to
2 further investigate facts related to the pending patent infringement action. There have been
3 no previous requests to continue the Defendants' time to respond to the Complaint.

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5 DATED: _November 9, 2007

Respectfully submitted,

6 THE LAW OFFICE OF
7 MANUEL DE LA CERRA

8
9 By: s/Manuel de la Cerra

Manuel de la Cerra

John L. Roberts

Attorneys for Defendants HERITAGE

10 TECHNOLOGIES, INC., CARL

11 THOMPSON and CHARLES WISSMAN

12
13 DATED: _November 9, 2007

Respectfully submitted,

14 ORRICK, HERRINGTON & SUTCLIFFE LLP

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16
17 By: s/Kent B. Goss

Kent B. Goss

Attorneys for Plaintiff GREENLEE

18 TEXTRON INC.

PROOF OF SERVICE

I am employed in San Diego County, State of California. I am over the age of 18 and not a party to the within action. My business address is 6885 Catamaran Drive, Carlsbad, CA 92011.

On November 9, 2007, I served on the interested parties in said action the following:

- **JOINT MOTION TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT**
- **[PROPOSED] ORDER TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT**

by placing a true copy thereof in a sealed envelope addressed as follows and deposited it in the U.S. Mail at Carlsbad, California:

**Kent B. Goss
Orrick Herrinton & Sutcliffe LLP
777 South Figueroa St, Suit 3200
Los Angeles, CA 90017**

**Attorney for Greenlee
Textron, Inc**

I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 9, 2007 at Carlsbad, California.

____s/Manuel F. de la Cerra_____
Manuel F. de la Cerra